

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION AT KNOXVILLE**

CLIFTON BRYANT and
JUDY BRYANT,
Plaintiffs,

VS.

NO.

THE STANDARD FIRE INSURANCE CO.,
Defendant.

JURY DEMAND

NOTICE OF REMOVAL

Defendant, The Standard Fire Insurance Co., hereby notifies the Judges of the United States District Court for the Eastern District of Tennessee, the clerk of the Chancery Court of Sevier County, Tennessee and Plaintiffs, Clifton Bryant and Judy Bryant, that the action described herein and filed in the Chancery Court of Sevier County, Tennessee, is removed to the United States District Court for the Eastern District of Tennessee, Knoxville Division pursuant to 28 U.S.C. § 1441.

1. On October 14, 2013, Plaintiffs, Clifton Bryant and Judy Bryant, filed a civil action bearing Docket No. 13-10-326, against the Defendant, The Standard Fire Insurance Co., in the Chancery Court of Sevier County, Tennessee. Service of the complaint and summons was made upon CT Corporation, the designated statutory agent of the Defendant, on October 22, 2013, by certified mail through the Department of Insurance of the State of Tennessee.

2. This action is filed by Plaintiffs for proceeds allegedly due under a contract of insurance written by Defendant, The Standard Fire Insurance Co., and insuring Plaintiffs' real property and contents in Sevier County, Tennessee which was allegedly destroyed by a fire occurring on or about October 22, 2011. Plaintiffs also make claims of statutory bad faith.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332. Specifically, the complaint demands damages in the amount of \$275,000.00, plus a 12.5% penalty for bad faith.

4. Plaintiff, Clifton Bryant, is a resident and citizen of the State of Tennessee and was a citizen of the State of Tennessee at the time of the filing of this action and at the time of removal. Plaintiff, Judy Bryant, is a resident and citizen of the State of Tennessee and was a citizen of the State of Tennessee at the time of the filing of this action and at the time of removal. Defendant The Standard Fire Insurance Co. is a corporation incorporated in Connecticut, with its principal place of business in Hartford, Connecticut. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number 13-10-326 is removed from the Chancery Court of Sevier County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/ Russell E. Reviere

Russell E. Reviere (BPR No. 07166)

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded first class U.S. Mail, postage prepaid to Travis D. McCarter, Baker Associates, 129 Commerce Street, Sevierville, TN 37862, counselor of record for Plaintiffs, and by electronic means via the Court's electronic filing system.

This the 6th day of November, 2013.

s/ Russell E. Reviere